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12 Attorneys for Defendant
13 TIJUANA, LLC

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 RUDI JIMENEZ,

17 Plaintiff,

18 vs.

19 TIJUANA, LLC, d/b/a ADVANCE MEDICAL
20 STAFFING, d/b/a RAPID TEMPS, INC., a
21 domestic limited liability company; DOES I-X;
22 and ROE BUSINESS ENTITIES I-X,
23 inclusive,

24 Defendants.

25 Case No.: 2:20-cv-00765-RFB-VCF

26 **STIPULATION TO EXTEND DEADLINE
27 FOR DEFENDANT TO RESPOND TO
28 PLAINTIFF'S COMPLAINT**

29 IT IS HEREBY STIPULATED by and between Plaintiff RUDI JIMENEZ ("Plaintiff"),
30 through her counsel, MAIER GUTIERREZ & ASSOCIATES, and Defendant, TIJUANA, LLC
31 d/b/a ADVANCE MEDICAL STAFFING, d/b/a RAPID TEMPS, INC. ("Defendant"), by and
32 through its counsel, Jackson Lewis P.C., that Defendant shall have an extension up to and
33 including June 10, 2020, in which to file its response to Plaintiff's Complaint. This Stipulation is
34 submitted and based upon the following:

35 1. Plaintiff filed her Complaint on April 28, 2020. ECF No. 1. Defendant was served
36 with the Summons and Complaint on April 29, 2020. ECF No. 6.

37 2. Defendant's response to the Complaint is currently due on May 20, 2020.

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1 3. Counsel for Defendant was recently retained in this matter. Due to the press of
2 other matters, including adjustments made necessary by the COVID-19 pandemic, and in order to
3 fully respond to the pleading, Defendant requires additional time to respond to the Complaint.
4 Defendant accordingly requests an extension, up to and including June 10, 2020, to file its
5 responsive pleading.

6 4. This is the first request for an extension of time for Defendant to file a response to
7 Plaintiff's Complaint.

8 5. This request is made in good faith and not for the purpose of delay.

9 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
10 as waiving any claim and/or defense held by any party.

11 Dated this 20th day of May, 2020

12 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

13 _____
14 /s/ *Danielle J. Barraza*
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16 Joseph Nathan Mott
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16 /s/ *Lynne K. McChrystal*
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26 Attorneys for Defendant

27 Attorneys for Plaintiff Rudi Jimenez

28 **ORDER**

29 IT IS SO ORDERED.



30 _____
31 U.S. Magistrate Judge

32 Dated: 5-27-2020